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RELATED CORRESPONDENCE

COMMONWEALTH OF PENNSYLVANIA
GOVERNOR'S ENERGY COUNCIL NOV -5 P2:14
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OFFICE OF
POLICY & PLANNING
783-0220

November 1, 1984

Helen F. Hoyt
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. Richard F. Cole
Administrative Judge
Atomic Safety and Licensing
Board
U.S. Nuclear Regulatory
Commission
Washington, D.C.

Dr. Jerry Harbour
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

RE: Limerick Nuclear Generating Station, Docket Nos.
50-352, 50-353 *DL*

Dear Administrative Judges:

In accordance with the Board's Orders dated August 15 and October 9, 1984, the Commonwealth of Pennsylvania hereby files testimony on Limerick Ecology Action (LEA) and City of Philadelphia offsite emergency planning contentions as admitted and specified in the Board's Orders dated April 20, September 24 and October 19, 1984. The testimony filed is complete except as explained in detail below. All reference materials not included with this testimony should already be in the hands of the parties.

The Commonwealth intends to offer as witnesses all persons whose written direct testimony is filed today. The Commonwealth intends to offer as an additional witness on Contentions LEA-11 and LEA-15 Mr. Don Bryan, Deputy Secretary for Local and Area Transportation, Pennsylvania Department of Transportation.

The Commonwealth's testimony filed today is complete in all but one respect. In addition to the testimony and witnesses heretofore identified, the Commonwealth intends to sponsor the testimony of Timothy S. Campbell, Director,

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Department of Emergency Services, Chester County on several of LEA's contentions. Mr. Campbell is preparing written direct testimony on those contentions; however, for reasons unknown to the Commonwealth, his testimony has not been completed in time to meet the Board's November 2 deadline. In view of the nature of many of LEA's contentions, the Commonwealth believes Mr. Campbell's testimony will contribute significantly to the record in this proceeding, and that the parties should have the benefit of reviewing his written direct testimony prior to the hearing. The Commonwealth understands that Mr. Campbell's testimony will be available for review by the State later today, and could be filed with the Board and parties early next week. The Commonwealth therefore hereby moves for permission to file out of time the written direct testimony of Timothy S. Campbell. Cf. 10 C.F.R. 2.743(b) (allow introduction of written testimony not served by prefiling deadline if parties have reasonable opportunity to examine it).

Very truly yours,



Zori G. Ferkin
Assistant Counsel
(717-783-0225)

Enclosures

CC: Service List